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April 6, 2017

**VIA ECF**

Hon. Michael A. Hammer  
United States Magistrate Judge  
United States District Court  
for the District of New Jersey  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: Accurate Abstracts, LLC v. Havas Edge, LLC**  
**Civil Action No. 2:14-cv-01994 (KM)(MAH)**

Dear Magistrate Judge Hammer:

We represent defendant Havas Edge, LLC ("Defendant") in the above-referenced matter. We write to request an adjournment of the deadline for filing motions for summary judgment, currently set for April 21, 2017, pending the Court's determination of Defendant's **unopposed Motion to Strike the Amended Expert Report of Rick Dove**. (ECF No. 59). We believe clarity is needed concerning the admissibility of Mr. Dove's proposed amended report before summary judgment motions are filed to avoid unnecessary confusion inasmuch as Plaintiff's reliance on such proposed amended report could have a material impact on the substance of the summary judgment briefing by the parties. Alternatively, since Plaintiff has filed no opposition to Defendant's above-referenced Motion, the Court could moot this request by simply granting Defendant's Motion to Strike.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**DLA Piper LLP (US)**

A handwritten signature in blue ink, appearing to read "Daniel Turinsky".

Daniel Turinsky  
Partner

cc: Anthony Ambrosio, Esq. (via ECF)